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DOCKET NO. 02-112 ORIGINAL

EX PARTE OR LATE FILED

Ex Parte

April 17, 2007

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, D.C. 20554

ORIGINAL

FILED/ACCEPTED

APR 17 2007

Federal Communications Commission
Office of the Secretary

Re: **REDACTED – FOR PUBLIC INSPECTION IN WC DOCKET
NO. 02-112 before the Federal Communications Commission
Section 272(f)(1) Sunset of the BOC Separate Affiliate and Related
Requirements**

Dear Ms. Dortch:

In response to a letter dated March 13, 2007, from Donald K. Stockdale, Associate Chief, Wireline Competition Bureau, and the Information Request attached thereto, AT&T Inc. (AT&T) hereby provides corrected data for the following response: 1.a., 1.a.i), 1.a.ii), 1.f. and 2.

This information contains material that is extremely sensitive from a commercial, competitive, and financial perspective, and that AT&T would not, in the normal course of its business, reveal to the public or to its competitors. Such material therefore is being submitted on a confidential basis pursuant to the **Second Protective Order**¹ in this proceeding and is appropriately marked. This response falls within the following category of “Highly Confidential Information”: “revenues or numbers of customers disaggregated by customer type and a market area smaller than the nation . . . including carrier-specific E911 line count listings.” Accompanying AT&T’s highly confidential information is a request for confidential treatment.

The confidential, non-redacted version of AT&T’s response will be made available for inspection, pursuant to the terms of the two **Protective Orders**, as applicable, at the law offices of Sidley Austin LLP. Counsel for parties to this proceeding should contact Brendan McMurrer of that firm at (202)736-8135 to coordinate access after they comply with the terms of the FCC’s **Protective Orders**. Parties seeking access to AT&T’s confidential documents should first serve the Acknowledgement of Confidentiality on Mr. McMurrer at Sidley Austin LLP, 1501 K Street, N.W., Washington, D.C. 20005.

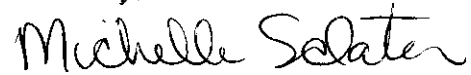
¹ **Section 272(f)(1) Sunset of the BOC Separate Affiliate and Related Requirements**, WC Docket No. 02-112, Second Protective Order, DA 07-1389 (rel. March 23, 2007) (**Second Protective Order**).

² **Second Protective Order** at para. 4. As discussed with FCC staff, AT&T has taken the additional step of masking the identity of unaffiliated providers in all of its responses.

REDACTED – FOR PUBLIC INSPECTION

Please do not hesitate to contact me if you require additional information.

Sincerely,

A handwritten signature in black ink that reads "Michelle Sclater". The script is cursive and fluid, with the first name and last name clearly distinguishable.

Michelle Sclater

Attachments

REDACTED – FOR PUBLIC INSPECTION

**HIGHLY CONFIDENTIAL INFORMATION – SUBJECT TO SECOND
PROTECTIVE ORDER IN WC DOCKET NO. 02-112 before the Federal
Communications Commission**

1.a. For each AT&T franchise area, provide: The number of AT&T's (including legacy AT&T's, legacy BellSouth's, and legacy SBC's) retail residential wireline local exchange service lines.

Response: **CORRECTION – the attached table replaces that filed on March 29, 2007 and April 6, 2007.** See attached.

In its March 29, 2007 and April 6, 2007 filings, AT&T provided estimates of the Legacy AT&T Corp.'s local lines by combining wholesale and E911 data. The information provided in today's filing reflects the line counts submitted by AT&T Corp. in response to the Commission's ongoing 477 data request.

Attachment 1.a.

Table(s) Redacted in Full

**HIGHLY CONFIDENTIAL INFORMATION – SUBJECT TO SECOND
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1.a.i) For each AT&T franchise area, provide: The number of these lines ~~for~~ which AT&T is the presubscribed interstate long distance carrier. Also provide the number of these lines that are presubscribed to: (1) an AT&T usage per minute plan; (2) an AT&T plan that includes a bucket of interexchange minutes; and (3) an AT&T plan that includes ~~an~~ unlimited number of interexchange minutes. For each individual plan, provide the number of lines, the total number of interstate interLATA long distance minutes, the average number of minutes used, and the standard deviation of minutes used.

Response: **CORRECTION – the attached table replaces that filed on March 29, 2007 and April 6, 2007.** See attached. AT&T is providing the Primary Interexchange Carrier counts (“PICs”) that are associated with the legacy AT&T Corp. local lines that were added to the corrected response to Specification #1 a.

In its prior filings on March 29, 2007 and April 6, 2007, AT&T provided a combined total for BellSouth Long Distance and legacy AT&T Corp. PIC counts that were associated with BellSouth’s residential access lines. In this filing, these volumes have been reduced to reflect only BSLD PICs. The legacy AT&T Corp. PICs that have been extracted from the prior totals are now incorporated in the response to Specification 1 a ii). This change was made due to the interpretation that legacy AT&T Corp. was considered to be “another” long distance provider during this time period in the **SE** region. This correction separates the two amounts and places them in the proper categories based on the timeline of the AT&T-BellSouth merger.

Attachment 1.a.i).

Table(s) Redacted in Full

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1.a.ii) For each AT&T franchise area, provide: The number of these lines for which each of Verizon, Sprint, or another long distance carrier is the presubscribed interstate long distance carrier.

Response: **CORRECTION – the attached table replaces that filed on March 29, 2007 and April 6, 2007.** See attached. This table has been updated to reflect the legacy AT&T PIC volumes in the SE region that were associated with Legacy BellSouth residential access lines. As mentioned in the Response to Specification 1 a i), AT&T is considering legacy AT&T Corp as “another” long distance provider for the requested time period (i.e. pre-AT&T/BellSouth merger). As such, these totals were removed from the counts in Specification 1 a i), and are now incorporated herein. In addition, with respect to the naming conventions, AT&T has included the appropriate affiliate name next to all AT&T entries in order to provide further clarity.

Attachment 1.a.ii).

Table(s) Redacted in Full

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1.f. For each AT&T franchise area, provide: By carrier, the number of residential access lines provided by facilities-based providers other than AT&T (e.g., E-911 listings in which AT&T is not the underlying local exchange carrier).

Response: **CORRECTION – the attached table replaces that filed on March 28, 2007 and April 6, 2007.** See attached. AT&T is correcting the overstated legacy SBC California line counts. In addition, AT&T is updating the SE region data to correct a few situations wherein E911 records were not properly updated to reflect the current provider's name with respect to access lines previously owned by AT&T Corp. (e.g. AT&T Broadband). Also, with respect to the naming conventions, AT&T has included the appropriate affiliate name next to all AT&T entries in order to provide further clarity.

Attachment I f.

Table(s) Redacted in Full

**HIGHLY CONFIDENTIAL INFORMATION – SUBJECT TO SECOND
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2. For each AT&T franchise area, provide the number of retail residential wireline lines for which AT&T is the presubscribed interstate long distance carrier but not the local exchange carrier.

Response: **CORRECTION – the attached table replaces that filed on March 30, 2007 and April 6, 2007.**

In its prior filings on March 30, 2007 and April 6, 2007, AT&T provided legacy AT&T standalone PICs on a statewide basis. In this filing, AT&T is providing revised data to reflect only those volumes in-franchise and to remove duplicative line counts. Within the SE region, AT&T is also identifying the legacy AT&T Corp. PICs associated with the legacy AT&T local residential lines. For consistency, in this instance, AT&T is considering legacy AT&T Corp as a competitive local exchange provider for the requested time period (i.e. pre-AT&T/BellSouth merger).

Attachment 2

Table(s) Redacted in Full